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law she did not acquire Turkish nationality. By French law, "a French woman marrying an alien follows the nationality of her husband, unless her marriage does not confer upon her the nationality of her husband," in which case she remains French. *Held*, that the woman remained French. *Kaaki v. Préfet de police* (July 18, 1918) *Tribunal civil de la Seine* (1919) 46 *Clunet*, 322.

In a similar situation an American woman would find herself in a difficult case, for sec. 3 of the law of March 2, 1907 imposes the husband's nationality upon her without the desirable French limitation that she acquire his nationality according to his national law. The French limitation is also found in the law of Mexico, Act of May 28, 1886, art. 2, sec. 4; Belgium, Act of June 8, 1909, art. 11, 102 *St. Pap.* 182; Italy, Civil Code, art. 14; Portugal, Civil Code, art. 22, sec. 4; Costa Rica, law of Dec. 21, 1886, art. 4, sec. 5; Venezuela, Civil Code, art. 19. Inasmuch as certain countries, such as Brazil, do not confer the husband's nationality on his alien wife, an American woman marrying such an alien would find herself endowed with her husband's nationality in the United States but not in her husband's country or else without any nationality. The Act of March 2, 1907, should be amended so as to embody the limitation of the French statute and similar statutes.

CONSTITUTIONAL LAW—DUE PROCESS—AMENDMENT OF STATUTE OF LIMITATIONS AFTER LIMITATION PERIOD HAS EXPIRED.—A suit upon a contract of indemnity was brought in a federal court in 1904, and was dismissed for lack of jurisdiction in 1912, judgment being affirmed on appeal in 1915. In 1910, but after the limitation period had passed, suit on the same cause was commenced in the state court. In 1913, 1915 and 1917 the Connecticut legislature passed amendments to the limitation statute, so that under the last amendment (and possibly under the others), suit might be brought in the state court within one year after dismissal for jurisdictional defects of a suit upon the same cause brought in the federal court. It was conceded that the amendment was intended to apply to the suit brought in 1910. *Held*, that the amendment did not violate the due process clause of the federal constitution since the statute affected only the remedy in the case of a contract unlike the case of real or personal property, where title vested upon the expiration of the limitation period. *Gilbert v. Selleck* (1919, Conn.) 106 *Atl.* 439.

See COMMENTS, *supra*, p. 91.

CORPORATIONS—MUNICIPAL CORPORATIONS—LIABILITY FOR TORT—GOVERNMENTAL FUNCTION.—The defendant city maintained a large wooden box on the street as a receptacle for trash and waste paper. The employee of the city who collected the contents of the box left the lid open and thrown back, extending about one foot over the sidewalk. The plaintiff, walking on the street, was struck in the eye. *Held*, that the city was liable. *Savannah v. Jones* (1919, Ga.) 99 *S. E.* 294.

In this case, the act negligently performed was in the interest of the public health, a governmental function. The city was held to be under a duty to keep the lid in its proper place and was liable for injuries resulting from a breach of this duty. For a discussion of a similar duty with respect to obstructions in the street, see *supra*, p. 117.

CORPORATIONS—PRIVATE CORPORATIONS—PURCHASE OF ITS OWN STOCK.—A bill was filed in equity by interveners claiming priority over the bondholders of an insolvent corporation. The bonds in question were issued to pay for the corporation's own stock which it had taken up. The mortgage security for the